



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Service
Office of Response and Restoration
Coastal Protection and Restoration Division
c/o EPA Region X (ECL-117)
1200 Sixth Avenue
Seattle, Washington 98101

July 28, 2006

Dan Opalski
Director
Office of Environmental Cleanup
U.S. Environmental Protection Agency, Region 10
1200 6th Avenue
Seattle, WA 98101

Dear Dan:

This letter provides **NOAA's comments on EPA's preliminary decision regarding the Round 3 scope of work for Pacific lamprey and white sturgeon under the Portland Harbor Superfund Site Ecological Risk Assessment (EcoRA)**. More specifically, these comments are provided in response your email dated July 14, 2006 with the subject "*Lamprey and Sturgeon Studies for the PH RI/FS*".

Based on message, NOAA understands that EPA intends to direct the LWG to conduct the following studies in support of the EcoRA:

For Pacific lamprey:

- Compare measured contaminant concentrations in Willamette River surface water to water quality criteria for aquatic life or other water column toxicity reference values (TRVs).
- Collect ammocoetes from the Portland Harbor site, perform chemical analyses on the whole body tissues, compare measured tissue residues in the ammocoetes to whole body tissue-based TRVs as a screening level evaluation of ecological risk.
- If sufficient live ammocoetes can be obtained from a relatively uncontaminated area, perform water column toxicity tests to evaluate the sensitivity of lamprey to contaminants relative to the sensitivity of other fish species.

For white sturgeon:

- Compare measured contaminant concentrations in Willamette River surface water to water quality criteria for aquatic life or other water column TRVs.
- Collect sub-adult (i.e., non-breeding) whole body tissue samples from sturgeon from the Portland Harbor site, compare measured tissue residues in the sturgeon to whole body tissue based TRVs as a screening level evaluation of ecological risk.



With respect to the second bullet under lamprey ammocoetes, NOAA recommends replacing the statement “Collect ammocoetes from the Portland Harbor site, perform chemical analyses on the whole body tissues, compare measured tissue residues in the ammocoetes to whole body tissue-based TRVs *as a screening level evaluation of ecological risk*” with “Collect ammocoetes from the Portland Harbor site, perform chemical analyses on the whole body tissues, compare measured tissue residues in the ammocoetes to whole body tissue-based TRVs *to evaluate ecological risk to this receptor.*”

Also with respect to the second lamprey bullet, NOAA anticipates that this field effort has the potential to result in the incidental capture of lamprey macrophthalmia in addition to lamprey ammocoetes. NOAA requests on behalf of the Natural Resource Trustees that the field sampling plan for this study includes specific instruction for the retention of any incidentally captured macrophthalmia. Any captured macrophthalmia should be separated from ammocoetes, preserved, and transferred to the Natural Resource Trustees for possible future analysis.

In closing, NOAA has co-trust responsibilities for these two important fishery resources in the Columbia River watershed and appreciates and supports EPA’s decision to direct the LWG to move forward with studies that will help to substantively inform the EcoRA for the Portland Harbor site to assure protection of these receptors. Furthermore, NOAA looks forward to working collaboratively with EPA, its partners and the LWG in the design and implementation of these investigations.

Sincerely,

Robert Neely
NOAA Coastal Resource Coordinator

cc:

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